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JOINT MOTION TO EXTEND TIME TO  
REQUEST APPROVAL OF  
SETTLEMENT

**BY ECF**

Honorable Colleen McMahon, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

MEMO ENDORSED

OK  
Colleen McMahon  
9/12/2023

**Re: Freddy Almonte Jerez v. Milea Truck Sales Corp., et. al.**  
**Case No. 23 Civ. 2562 (CM)**

Dear Judge McMahon,

We are counsel to the plaintiff. This is our request for a short extension, to September 15<sup>th</sup>, to file the parties' settlement agreement. Counsel are finalizing the agreement, reviewing with our respective clients and preparing the request for approval. This is our first request for a short extension, no other deadlines will be impacted, and it is on consent.

Thank you for your consideration of this case.

Respectfully submitted,

/s/ Peter H. Cooper

Peter Hans Cooper

cc: Counsel of Record (Via ECF)